

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA, :
: Plaintiff, :
: v. : Criminal Action No. 07- 59
: :
FRANKELY ROBLES GUZMAN, :
a/k/a "Tomas Maldonado Alvarado," :
a/k/a "Amilcar Almodovar Colmenero," :
a/k/a "Rafael Cruz Rivera," :
: Defendant. :
:

REDACTED

INDICTMENT

The Grand Jury for the District of Delaware charges that:



COUNT ONE

On or about March 23, 2007, in the Commonwealth and District of Massachusetts,
FRANKELY ROBLES GUZMAN, defendant herein, an alien and a citizen of the Dominican
Republic, falsely and willfully represented himself to be a citizen of the United States, to wit, he
represented himself to be Tomas Maldonado Alvarado, born on in Rio Piedras,
Puerto Rico, with Social Security number 1657, all in violation of Title 18, United States
Code, Section 911.

COUNT TWO

On or about March 23, 2007, in the Commonwealth and District of Massachusetts,
FRANKELY ROBLES GUZMAN, defendant herein, did knowingly use, without lawful
authority, a means of identification of Tomas Maldonado Alvarado, during and in relation to a
violation of the false representation of citizenship statute, Title 18, United States Code, Section

911, as set forth above in Count I, which is incorporated herein by reference, all in violation of Title 18, United States Code, Section 1028A.

COUNT THREE

On or about May 21, 2004, in the State and District of Delaware, FRANKELY ROBLES GUZMAN, defendant herein, willfully and knowingly made false statements in an application for a passport with the intent to induce and secure the issuance of a passport under the authority of the United States for his use, contrary to the laws regulating the issuance of such passports and the rules prescribed pursuant to such laws, in that in such application the defendant stated that his name was Amilcar Almodovar Colmenero, and he was born in Rio Piedras, Puerto Rico or all in violation of Title 18, United States Code, Section 1542.

COUNT FOUR

On or about May 21, 2004, in the State and District of Delaware, FRANKLEY ROBLES GUZMAN, defendant herein, with the intent to deceive and for the purpose of obtaining a United States passport, falsely represented that a Social Security number was the Social Security number assigned to him by the Commissioner of Social Security, when, in fact, that number had been assigned to Amilcar Almodovar Colmenero and the defendant knew it was not the Social Security number assigned to the defendant, in violation of Title 42, United States Code, Section 408(a)(7)(B).

COUNT FIVE

On or about May 21, 2004, in the State and District of Delaware, FRANKELY ROBLES GUZMAN, defendant herein, did knowingly use, without lawful authority, a means of identification of another person, specifically, the name, date of birth, and Social Security number of Amilcar Almodovar Colmenero, with the intent to commit an unlawful activity that constitutes

a felony violation of federal law, to wit, passport fraud in violation of Title 18, United States Code, Section 1542, all in violation of Title 18, United States Code, Section 1028(a)(7).

COUNT SIX

On or about June 18, 2003, in the Commonwealth and Territory of Puerto Rico, FRANKELY ROBLES GUZMAN, defendant herein, an alien and a citizen of the Dominican Republic, falsely and willfully represented himself to be a citizen of the United States, to wit, he represented himself to be Rafael Cruz Rivera, born on [redacted], in Rio Piedras, Puerto Rico, all in violation of Title 18, United States Code, Section 911.

COUNT SEVEN

On or about June 18, 2003, in the Commonwealth and Territory of Puerto Rico, FRANKELY ROBLES GUZMAN, defendant herein, did knowingly possess identification documents not issued lawfully for the use of the defendant, to wit, a Social Security card, Puerto Rican birth certificate, and Puerto Rican driver's license, which were all in the name Rafael Cruz Rivera, with the intent that such documents be used to defraud the United States, as set forth in Count Five above, which is incorporated herein by reference, all in violation of Title 18, United States Code, Section 1028(a)(4).

A TRUE BILL.

Foreperson

COLM F. CONNOLLY
United States Attorney

BY:

Sophie E. Bryan
Sophie E. Bryan
Assistant United States Attorney

Dated: April 14, 2007